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The February 17 conference is adjourned without date. SO ORDERED. 2/10/2023

P. Kevin Castel United States District Judge

VIA ECF

February 9, 2023

Hon. P. Kevin Castel Daniel Patrick Moynihan U.S. Courthouse 500 Pearl St. New York, NY 10007

Re: B.S. v. Joyce, 22-cv-9738 (PKC)

Dear Judge Castel,

cc:

The Legal Aid Society represents the petitioner, B.S., in the above-captioned habeas proceeding, which relates to the procedures constitutionally required at an immigration bond proceeding under 8 U.S.C. § 1226(a). An initial pretrial conference is scheduled for February 17, 2023. Given that the habeas petition is fully briefed, the parties agree that an initial conference is not necessary.

I therefore write to respectfully request that the initial pretrial conference be converted to oral argument on the fully-briefed habeas petition or, in the alternative, be adjourned *sine die*. The government takes no position on our request for oral argument, and consents to our alternative request for adjournment.

If the Court decides to hold oral argument, the parties request that any hearing be done either telephonically or by videoconference, as counsel for the government resides and works in Chicago.

We thank the Court for its consideration of this letter.

Respectfully submitted,

/s/ Julie Dona
Julie Dona

Counsel for Petitioner

Assistant United States Attorney Joshua Press (via ECF)